

EXHIBIT E

1 Timothy R. Titolo, Esq.
2 Nevada Bar No. 003617
3 TITOLO LAW OFFICE
4 9812 Guiding Light Ave.
5 Las Vegas, Nevada 89149
6 (702) 869-5100
7 tim@titololaw.com

8
9 John D. McKay, Esq.
10 *Admitted pro hac vice*
11 PARK AVENUE LAW LLC
12 201 Spear Street, Suite 1100
13 San Francisco, CA 94105
14 (434) 531-9569
15 johndmckayatty@gmail.com
16 *Attorneys for Plaintiffs*

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19 **UNITED STATES DISTRICT COURT**
20 **FOR THE DISTRICT OF NEVADA**

21 PETER DELVECCHIA, *et al.*,) Case No: 2:19-CV-01322-KJD-DJA
22)
23 Plaintiffs,) PLAINTIFF PETER DELVECCHIA'S
24) OBJECTIONS TO DEFENDANT
25 vs.) FRONTIER'S SECOND SET
26) OF INTERROGATORIES
27)
28 FRONTIER AIRLINES, INC., *et al.*,)
29 Defendants.)
30 _____)

31 Plaintiff Peter DelVecchia ("Plaintiff"), by counsel, hereby responds to the Second Set of
32 Interrogatories propounded by Defendant Frontier Airlines, Inc. ("Frontier") pursuant to Fed.R.Civ.P. 33
33 as follows:

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35 **OBJECTION TO THE INSTRUCTIONS**

36 Plaintiff objects to the instructions preceding the Interrogatories. They are boilerplate
37 instructions that attempt to alter Plaintiff's responsibilities under the Federal Rules of Civil Procedure
38 and/or state rules that Frontier itself has repeatedly refused to follow in this litigation. Plaintiff will
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1 respond in accordance with the Federal Rules of Civil Procedure, and does not agree to comply with any
2 additional terms.

3 **OBJECTION TO THE DEFINITIONS**

4 Plaintiff objects to Definitions 1-3 and 7, as they attempt to ascribe meanings to ordinary words
5 that differ from common usage. Plaintiff will assume any word used in the Interrogatories carries only
6 its ordinary dictionary meaning for the specific context in which it is used. Plaintiff does not agree to be
7 bound by any artificially ascribed different or expanded meanings contained in the Definitions.
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10 **OBJECTIONS TO THE INTERROGATORIES**

11 1. State the full name, address, and telephone number of any person(s) who witnessed or observed [sic]
12 Defendant Warren commit a battery upon Plaintiff Peter DelVecchia during the Subject Flight.

13 **OBJECTION:** “[Plaintiff] objects to Interrogatory No. 1 because it is overly broad, seeks information
14 that is not relevant to any party’s claim or defense, and is not proportional to the needs of the case.
15 [Plaintiff] also objects to Interrogatory No. 1 because producing such information may violate privacy
16 rights held by [such witnesses].” Defendant Frontier Airlines, Inc.’s Answers to Plaintiffs’
17 Interrogatories dated November 21, 2019 (modified).

18 2. State the full name, address, and telephone number of any person(s) who witnessed Defendant Warren
19 re-seat, move, direct and/or escort A.D. from Row 17 to Row 30 during the Subject Flight.

20 **OBJECTION:** “[Plaintiff] objects to Interrogatory No. 2 because it is overly broad, seeks information
21 that is not relevant to any party’s claim or defense, and is not proportional to the needs of the case.
22 [Plaintiff] also objects to Interrogatory No. 2 because producing such information may violate privacy
23 rights held by [such witnesses].” Defendant Frontier Airlines, Inc.’s Answers to Plaintiffs’
24 Interrogatories dated November 21, 2019 (modified).

25 3. State the full name, address, and telephone number of any person(s) who heard the allegedly
26 defamatory statements made by Defendant Warren during the Subject Flight and/or on the Subject
27 Aircraft [sic].

28 **OBJECTION:** “[Plaintiff] objects to Interrogatory No. 3 because it is overly broad, seeks information
29 that is not relevant to any party’s claim or defense, and is not proportional to the needs of the case.
30 [Plaintiff] also objects to Interrogatory No. 3 because producing such information may violate privacy
31 rights held by [such witnesses].” Defendant Frontier Airlines, Inc.’s Answers to Plaintiffs’
32 Interrogatories dated November 21, 2019 (modified).

1 4. Identify all passengers who have provided you with written statements regarding the Subject Flight,
2 or their observations of the flight attendants during the Subject Flight.

3 **OBJECTION:** “[Plaintiff] objects to Interrogatory No. 4 because it is overly broad, seeks information
4 that is not relevant to any party’s claim or defense, and is not proportional to the needs of the case.
5 [Plaintiff] also objects to Interrogatory No. 4 because producing such information may violate privacy
rights held by [such passengers].” Defendant Frontier Airlines, Inc.’s Answers to Plaintiffs’
Interrogatories dated November 21, 2019 (modified).

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8 DATED this 6th day of July, 2022.

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Attorney for Plaintiff Peter DelVecchia

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13 CERTIFICATE OF SERVICE

14 I HEREBY CERTIFY that on July 6, 2022, pursuant to prior agreement of counsel permitting
15 electronic service by email, I served the foregoing responses and objections on counsel for Defendants
16 by email addressed to the following persons:

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18 Brian T. Maye, Esq.
19 Lawrence S. Gosewisch, Esq.
20 Matthew D. Martin, Esq.
21 ADLER MURPHY & McQUILLEN LLP
22 20 South Clark Street, Suite 2500
23 Chicago, Illinois 60603
24 Email: bmaye@amm-law.com
25 lgosewisch@amm-law.com
26 mmartin@amm-law.com

27

28 Charles A. Michalek, Esq.
29 ROGERS, MASTRANGELO, CARVALHO & MITCHELL
30 700 South Third Street
31 Las Vegas, Nevada 89101
32 Email: cmichalek@rmcmllaw.com

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